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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

GURINDER KIREN MAND,

Defendant.

No. CR 11-00422 LHK

STIPULATION AND ~~PROPOSED~~
ORDER RESCHEDULING CHANGE OF
PLEA/STATUS CONFERENCE TO
DECEMBER 5, 2012; EXCLUSION OF
TIME

The United States and defendant Gurinder Kiren Mand respectfully request that defendant's change of plea/status hearing be rescheduled from November 21, 2012, to December 5, 2012, (or other date convenient to the Court), to permit defendant additional time to evaluate the written plea offer and to conduct necessary investigation, and the parties seek an exclusion of time.

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US v. Mand, CR 11-00422 LHK
Stipulation and ~~Proposed~~ Order

1 DATED: November 19, 2012

MELINDA HAAG
United States Attorney

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4 GRANT P. FONDO
Assistant United States Attorney

5 /S/

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7 RONI ROTHOLZ
Counsel for Defendant

8 **ORDER**

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10 Based upon the representation of counsel and for good cause shown, the Court finds that
11 failing to exclude the time between November 21, 2012, and December 5, 2012, would
12 ~~unreasonably deny the defendant continuity of counsel and would deny counsel the reasonable~~
13 time necessary for effective preparation, taking into account the exercise of due diligence. 18
14 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding
15 the time between November 21, 2012, and December 5, 2012, from computation under the
16 Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.
17 Therefore, IT IS HEREBY ORDERED that the time between November 21, 2012, and
18 December 5, 2012, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
19 3161(h)(7)(A) and (B)(iv).
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21 IT IS SO ORDERED.

22 DATED: 11/20/12

23 Lucy H. Koh
LUCY H. KOH
UNITED STATES DISTRICT JUDGE